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5 PaR Systems, LLC  
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8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**  
11

12 **In re:**  
13 **PG&E CORPORATION,**  
14 **Debtor.**

Case No. 19-30088-DM  
(Lead Case)  
(Jointly Administered)\_\_\_\_\_

Chapter Number: 11

**NOTICE OF LIEN UNDER 11 U.S.C.**  
**§ 546(b) BY PAR SYSTEMS, LLC**

17 **In re:**  
18 **PACIFIC GAS AND ELECTRIC**  
19 **COMPANY,**  
20 **Debtor.**

21 ☐ Affects PG&E

22 ☒ Affects Pacific Gas and Electric  
Company

23 ☐ Affects both debtors  
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**PAR SYSTEMS, LLC'S NOTICE OF PERFECTION  
OF SECTION 546 INTERESTS**

**TO THE HONORABLE U.S. BANKRUPTCY JUDGE:**

PLEASE TAKE NOTICE that PaR Systems, LLC ("PaR Systems") is the general contractor under a certain pre-petition Contract (Long Form) No. C9407 (the "Contract") with Debtor, Pacific Gas and Electric Company ("Pacific Gas & Electric"). PaR Systems has contracted thereunder to provide the Work (as defined in the Contract) described in the Contract and to furnish all labor, equipment and materials necessary to complete the Work. Prior to the filing of the Debtors' bankruptcy case, PaR Systems provided labor, equipment, services and supplies to Pacific Gas & Electric under the Contract at Pacific Gas & Electric's property located at:

**PG&E Helms Pumped Storage Powerhouse Headquarters (HQ)**

**67250 Helms Circle**

**Shaver Lake, CA 93664** (the "Property").

The Work under the Contract is a "work of improvement" as is defined under California Civ. Code. § 8050(a). Under California Civ. Code § 8412, A direct contractor may not enforce a lien unless the contractor records a claim of lien after the contractor completes the direct contract, and before the earlier of the following times:

(a) Ninety days after completion of the work of improvement.

(b) Sixty days after the owner records a notice of completion or cessation.

Likewise, 11 U.S.C. §8460(a) provides that,

(a) The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable

Pursuant to 11 U.S.C. § 546(b), PaR Systems hereby gives notice in lieu of the commencement of any such action to perfect, maintain, or continue PaR Systems' lien.

Accordingly, PaR Systems requests adequate protection of its lien.

1 PaR Systems asserts a secured interest in the Property to the fullest extent allowable by  
2 applicable law, including interest and attorney's fees. Further, PaR Systems reserves the right to  
3 supplement and/or amend this Notice, and reserves any and all other rights under applicable law.

4 Respectfully Submitted,

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6 Dated: February 15, 2019

**Barnes & Thornburg LLP**

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8 By: /s/ Janet D. Gertz  
9 Janet D. Gertz

10 Attorneys for Creditor  
11 PaR Systems, LLC  
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